

Robert F. Hinton (Bar No. 98110)
Helen S. Baek (Bar No. 265514)
ARCHER NORRIS
A Professional Law Corporation
333 South Grand Avenue, Suite 1700
Los Angeles, CA 90071
Telephone: (213) 437-4000
Facsimile: (213) 437-4011

Attorneys for Defendants,
ADVANCE CULTURAL EDUCATION AND
TRAINING CORPORATION, a California
corporation, NAPAT VORAPUVADOL A/K/A
NAWACHOL BOONTHAM, NARIN
NATHRADOL, A/K/A MONNOPA
KOMOLKETRUCK, and SUPAWADEE
POONDEJ

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
OAKLAND DIVISION

I.E.I. COMPANY LIMITED, a
Thailand corporation;
INTERNATIONAL EDUCATION ,
INC., a Seychelles corporation,,
Plaintiffs,

v.

ADVANCE CULTURAL
EXCHANGE TRAINING
CORPORATION, a California
corporation, initially named herein as
"Advance Cultural Education and
Training Corporation", NAPAT
VORAPUVADOL, a/k/a Nawachol
Boontham, an individual; NARIN
NATHRADOL, a/k/a Monnipa
Komolketruck, an individual;
SUPAWADEE POONDEJ, a/k/a
Supavadee Poondej, an individual;
DOES 1 through 10, inclusive,,
Defendants.

Case No. 4:09-CV-05079 PJH

**STIPULATION TO CONTINUE
JUNE 16, 2010 HEARING ON
MOTION TO TRANSFER VENUE;
DECLARATION IN SUPPORT
THEREOF; ORDER THEREON
[PROPOSED]**

Defendants, Napat Vorapuvadol, Narin Nathradol, Supawadee Poondej and

Advance Cultural Exchange Training Corporation ("Defendants") and Plaintiffs,

1 I.E.I. Company Limited and International Education, Inc. ("Plaintiffs"), by and
2 through their undersigned counsel, stipulate and agree as follows:

3
4 Pursuant to Civil Local Rules 6-1(b), 6-2(a) and (b), 7-7(b) and (d), the
5 parties, by and through their respective attorneys of record, hereby stipulate and
6 agree that the hearing date on Defendants' Motion to Transfer Venue be continued
7 until July 7, 2010 and that Defendants' Reply, if any, be continued pursuant to Civil
8 Local Rule 7-7(d).
9

10 This stipulation is made upon the following grounds and based on the
11 following facts and events:
12

13 1. Less than 48 hours ago, i.e., on Wednesday, May 26, 2010, the parties
14 participated in a lengthy mediation session conducted by Mediator Stewart H.
15 Foreman on Wednesday, May 26, 2010, in Department No. 17 of the United States
16 District Court, located at 450 Golden Gate Avenue. Substantial progress to
17 resolving the subject litigation was made. Settlement discussions are continuing
18 and the parties wish to direct their limited time and resources to this task.
19

20
21 2. Defendants' Motion to Transfer Venue was filed on May 10, 2010.
22 Plaintiffs filed their Opposition on May 26, 2010. Hearing is currently set thereon
23 for June 16, 2010. Defendants' Reply is not yet due.
24

25 3. The parties hereto have not previously made a request for a
26 continuance of this hearing or Motion.
27

28 4. The only Stipulation previously requested by the parties in this matter

1 was on December 30, 2009. There, the parties sought leave for Plaintiffs' to file
2 their Second Amended Complaint and an extension of time to respond to same.

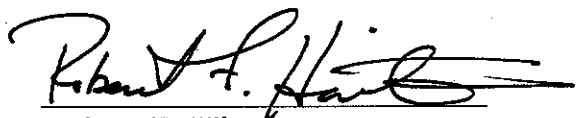
3
4 This Court granted said Stipulation on January 13, 2010.

5 5. This immediate Stipulation is requested in good faith and based on the
6 facts above and the attendant Declaration of Robert F. Hinton.

7
8 6. Respectfully, it is requested that this Stipulation be granted.

9 Dated: May 28, 2010

Respectfully submitted,
ARCHER NORRIS, PLC

11
12 By: 
13 Robert F. Hinton
14 Attorneys for Defendants, Napat
15 Vorapuvadol, Narin Nathradol,
16 Supawadee Poondej and
Advance Cultural Training
Corporation

17 Dated: May 28, 2010

Respectfully submitted,
KRONENBERGER BURGOUYNE, LLP

19
20 By: /s/ Karl S. Kronenberger (per consent)
21 Karl S. Kronenberger
22 James V. Weixel, Jr.
23 Attorneys for Plaintiffs,
24 I.E.I. Company Limited and
25 International Education, Inc.
26
27
28

ORDER

PURSUANT TO STIPULATION, IT IS HEREBY ORDERED THAT:

- 1. Defendants' Motion to Transfer Venue is hereby continued to Wednesday, July 7, 2010, at 9:00 a.m. in Department 3 of this Court;**
- 2. Defendants' Reply, if any, is due pursuant to Civil Local Rule 7-7(d); and**
- 3. Should the parties reach settlement in this matter, they will promptly notify this Court of same, as required by Civil Local Rule.**

June 1

Dated: May __, 2010

The Honorable Phyllis F. Hamilton
United States District Judge

